

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

KAVITA J. JAGTIANI

Debtor

Case No. 5-19-02155

Chapter 13

Robert N. Opel, II, C.B.J.

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**OBJECTION OF CS MANAGEMENT GROUP, LLC TO MOTION  
FOR RULE 2004 EXAMINATION**

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AND NOW, comes CS Management Group, LLC, by and through its attorney, Brian E. Manning, Esquire and files the following objection to the Motion for Rule 2004 Examination filed by Itria Ventures, LLC:

1. Denied as stated. While it is admitted that the Court has jurisdiction over the above captioned bankruptcy proceeding, it is denied, for the reasons which follow, that it has jurisdiction to order the Examination of CS Management Group, LLC under Bankruptcy Rule 2004.

2. Admitted.

3. Admitted.

4. After reasonable investigation, the objecting party is without sufficient knowledge or information to form a belief as to the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial. By way of further answer the Movant has failed to attach the document referred to in the corresponding paragraph of the Motion.

5. After reasonable investigation, the objecting party is without sufficient knowledge or information to form a belief as to the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial. By way of further answer the Movant has failed to attach the document referred to in the corresponding paragraph of the Motion.

6. After reasonable investigation, the objecting party is without sufficient knowledge or information to form a belief as to the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial. By way of further answer the Movant has failed to attach the document referred to in the corresponding paragraph of the Motion.

7. After reasonable investigation, the objecting party is without sufficient knowledge or information to form a belief as to the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial. By way of further answer the Movant has failed to attach the document referred to in the corresponding paragraph of the Motion.

8. After reasonable investigation, the objecting party is without sufficient knowledge or information to form a belief as to the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial. By way of further answer the Movant has failed to attach the document referred to in the corresponding paragraph of the Motion.

a. After reasonable investigation, the objecting party is without sufficient knowledge or information to form a

belief as to the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial.

b. After reasonable investigation, the objecting party is without sufficient knowledge or information to form a belief as to the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial.

c. After reasonable investigation, the objecting party is without sufficient knowledge or information to form a belief as to the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial.

d. After reasonable investigation, the objecting party is without sufficient knowledge or information to form a belief as to the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial.

9. After reasonable investigation, the objecting party is without sufficient knowledge or information to form a belief as to the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial.

10. After reasonable investigation, the answering party is without sufficient knowledge or information to form a belief as to the allegations being made. Said allegations are therefore denied and strict proof thereof is demanded at the time of hearing or trial.

11. Denied. Your Objector, CS Management Group, LLC (hereinafter "CSMG"), was the good faith purchaser of the assets from Fuel-Up Scranton, LLC in November of 2017, in an arm's length transaction. CSMG is unfamiliar with Plutus 1, LLC (hereinafter "Plutus"), Itria Ventures, LLC (hereinafter "Itria"), or the Debtor in the above captioned case. By way of further answer, CSMG has no knowledge relating to the Debtor's assets, financial affairs, or her bankruptcy estate.

12. Denied. There is no factual or legal basis for the Movant to seek an Examination of CSMG under Bankruptcy Rule 2004.

13. The allegations set forth in paragraph 13 of the Motion are conclusions of law to which no response is required. To the extent that a response is deemed to be required, CSMG denies any knowledge regarding the Debtor, her financial affairs, or any other matter which might affect the administration of her bankruptcy estate.

14. The allegations set forth in paragraph 13 of the Motion are conclusions of law to which no response is required. To the extent that a response is deemed to be required, CSMG denies any knowledge regarding the Debtor, her financial affairs, or any other matter which might affect the administration of her bankruptcy estate.

15. Denied. It is specifically denied that CSMG was the transferee of any assets belonging to the Debtor or Plutus.

WHEREFORE, your Objector, CS Management Group, LLC, respectfully requests that this Court enter an order denying the Motion of Itria Ventures, LLC, for Rule 2004 Examination of CS Management Group, LLC, and granting your Objector such other and further relief as the Court deems just and appropriate under the circumstances.

Respectfully Submitted,  
**Law Offices of Brian E. Manning**  
/s/ Brian E. Manning  
Brian E. Manning, Esquire  
502 S. Blakely, St., Suite B  
Dunmore, PA 18512  
Tel. 570-558-1126  
Fax 866-559-9808  
Attorney for CS Management Group, LLC

Dated: July 25, 2019